

**NORRIS McLAUGHLIN & MARCUS**

Elizabeth L. Abdelmasieh (EA-3856)

A Professional Corporation

721 Route 202-206

P.O. Box 1018

Somerville, NJ 08876-1018

(908) 722-0700

Attorneys for Rotor Clip Company, Inc.

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re:	:	Chapter 11
	:	
DELPHI CORPORATION, et al.,	:	Case No. 05-44481
	:	
Debtors.	:	
	:	
	:	

**NOTICE OF RECLAMATION DEMAND OF ROTOR CLIP COMPANY, INC.**

Please be advised that a Notice of Reclamation Demand on behalf of Rotor Clip Company, Inc. ("Rotor Clip") was served on October 13, 2005 on the Debtors and their attorneys of record, John Wm. Butler, Jr. and Kayalyn A Marafioti, Skadden, Arps, Slate Meagher & Flom LLP. A true and correct copy of the Notice of Reclamation Demand is attached hereto as Exhibit "A" and incorporated herein by reference for all purposes.

Rotor Clip makes this demand pursuant to §546(c)(1) of the United States Bankruptcy Code and §2-702 of the Uniform Commercial Code and the procedures established by Order of the United States Bankruptcy Court for the Southern District of New York granting the Motion for Order under 11 U.S.C. §362, 503 and 546 and Fed. R. Bank. Proc. 9019 for Treatment of Reclamation Claims.

Rotor Clip's reclamation demand is for goods delivered during the statutory reclamation period having an aggregate value of \$146,296.61 as reflected on the spreadsheet filed herewith.

The goods delivered to the Debtors are too varied and extensive to list herein. The spreadsheets identify, among other things, the part numbers of the goods shipped and the specific Debtor entity and location to which the goods were shipped. Rotor Clip submits that this information is sufficient to enable the Debtors to reasonably determine which goods Rotor Clip seeks to reclaim. Rotor Clip reserves its right to amend this demand.

Dated: October 13, 2005

NORRIS, McLAUGHLIN & MARCUS, PA  
Attorneys for Rotor Clip Company, Inc.

By: s/  
ELIZABETH ABDELMASIEH(EA3856)